



May 15, 2025

Sent via email to: [Robert.Matz@hlg.edu](mailto:Robert.Matz@hlg.edu)

Robert Matz  
President  
Hannibal-LaGrange University  
2800 Palmyra Road  
Hannibal, MO 63401

**Re: Decision regarding ownership signatory requirements on a recertification application**

Dear President Matz:

This letter is to notify Hannibal-LaGrange University ("Hannibal-LaGrange") of the Department's position regarding signature requirements on a recertification application submitted to continue participation in Title IV, Higher Education Act (HEA) Programs. After careful reconsideration, the Department has determined the below alternative for Hannibal-LaGrange in moving forward with submission of its Program Participation Agreement.

34 CFR 668.14(a)(3) requires (i) "an institution's program participation agreement be signed by an authorized representative of the institution" and (ii) "for a proprietary or private nonprofit institution, an authorized representative of an entity with direct or indirect ownership of the institution if that entity has the power to exercise control over the institution." Hannibal-LaGrange's Articles provide that Missouri Baptist Convention (MBC), in its capacity as Hannibal-LaGrange's sole member has the power to exercise control over the institution.

Institutions with entities that meet the above-stated requirement may designate an "authorized representative" that will have authority to sign the agreement. If the entity chooses to designate an individual, such as the President of the institution, as the "authorized representative," it must provide confirmation of the named individual on the entity's official letterhead and signed by an individual with authorization to make such a determination. Upon receipt of the entity's designation, the Department will consider the authorized representative as the individual responsible for signing the agreement until the designation is otherwise revoked or another individual is designated.

Please accept this letter as formal notification that the Department rescinds any previous determinations regarding signatory ownership requirements on a recertification application. This new decision is not retroactive. If you have any questions, please send your questions to [caseteams@ed.gov](mailto:caseteams@ed.gov).

Hannibal-LaGrange University  
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Sincerely,

**RHONDA  
SHAFFER**

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Rhonda C. Shaffer

Executive Director, FSA Chief Financial Officer & Acting Executive Director IHE O&E  
Office of Federal Student Aid  
U.S. Department of Education